

EX PARTE OR LATE FILED



GTE Service Corporation
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202 463-5200

March 13, 1995

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Washington, DC 20554

RECEIVED

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

RE: **Ex Parte Filing** - CC Docket No. **DOCKET 56** FILE COPY ORIGINAL

Dear Mr. Caton:

This is to advise that an ex parte presentation was made in the above matter at the Washington office of GTE Service Corporation to Laurel Bergold of the Office of the General Counsel and Rose Crellin of the Common Carrier Bureau on March 10 by the following representatives of GTE:

Mike Drew - Group Product Manager - Network Services
Al Banzer - Manager - Central Area Pricing & Tariffs
Gordon Maxson - Director - Regulatory Affairs
Ed Shimizu - Director - Regulatory Matters

The attached document covers the matters discussed and responds to questions raised by the FCC staff members regarding GTE's ONA plan and tariff waivers.

Two copies of this Notice are hereby filed with the Secretary of the Commission in accordance with Section 1.1206(a) of the Rules. Please include this letter in the record of this proceeding.

I may be reached at (202) 463-5291 if further information is needed.

Sincerely,

F. Gordon Maxson
Director -Regulatory Affairs

Attachment

C: Laurel Bergold
Rose Crellin

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ADDITIONAL INFORMATION REQUESTED ABOUT THE GTE ONA PLAN

(1) Attachment A lists the GTE ONA product line. The following describes the information contained in the document and how the ONA classifications were determined.

Column 1 The BOC ONA Services User Guide reference number for ONA services (9000 series is used to identify GTE services not contained in the Generic 1000 series.)

Column 2 The Generic ONA nomenclature from the BOC ONA Services User Guide.

Column 3 GTE's Product Names for the ONA services.

Column 4 Identification of GTE's ONA Services as contained in the GTE ONA Plan. This list identifies the regulated network services and does not contain the single ANS offered by GTE.

Column 5 Identification of GTE's ONA Services that are proposed to be placed in the federal and state access tariffs.

Column 6 Identification of GTE's ONA Services that are proposed to be placed in the federal and state access tariffs that require costing/pricing work due to their being new rate elements or currently non-chargeable items in the bundled feature groups.

The remaining ONA Services are currently available in the federal and state access tariffs.

The products were given the Basic Serving Arrangement (BSA), Basic Service Element (BSE) and Complimentary Network Service (CNS) classifications based upon the Unbundling ONA Model used by the BOCs and determination by GTE as to whether the service would be of utility to an ESP for the delivery of an enhanced service. The product was classified as a BSA if it was an arrangement that may be desired by the ESP to gain access to the serving central office of their customers. The product was classified as a BSE if it could be an optional feature or function that could be placed on the ESP's BSA and of utility to the ESP for the delivery of an enhanced service. The product was classified as a CNS if it could be an optional feature or function on the ESP end user's line and of utility to the ESP for the delivery of or access to an enhanced service. In certain circumstances, an optional feature or function could be of use both by the ESP on their BSA and by their customer for use of the enhanced service and was thus classified as both a BSE and CNS (i.e., B/C).

(2) Q. If BSAs and BSEs are identified in GTE's ONA Product Line and not identified as being placed in the federal and state access tariffs, explain the reason.

A. The additional BSA and some of the BSEs not identified as being placed in the federal and state access tariffs are currently contained in the general exchange tariffs and are local services due to technical limitations. This would be true for the services that would be utilized by an alarm services ESP where specialized equipment must be installed and the service is not offered on an interexchange basis.

The intended use of a service would also limit the service as local and would not pertain to the federal and state access tariffs. This would be true for Foreign Exchange service.

Other BSEs identified in GTE's ONA product line are not included in the access tariffs due to GTE's assessment that there is no utility to ESPs nor sufficient market demand to support placing the capabilities in the federal and state access tariffs. These services are currently available for use by ESPs from existing tariffs.

GTE will accept new service requests for additional BSEs, and will place the services in the federal and state access tariffs if they meet the Commission's four criteria for ONA Services.

(3) Q. On Attachment B, which compares GTE's ONA Service Deployment Projections with those of the RBOCs from the CC Docket 88-2 Phase I Memorandum Opinion and Order Released 12/19/91, please explain the information provided.

A. This chart was prepared at the request of the Commission to compare the percentage of GTE's ONA Products that are available to 80% or greater and 90% or greater of GTE's total access lines to the data of the RBOCs from the 12/19/91 Order.

Since GTE's percentage availability to 80% of the lines was comparable to the RBOCs but the percentage to 90% or greater was lower, GTE performed a further assessment to try to determine the reason. The chart provides additional data for the categories of "85% or Greater" and "87% or Greater" as well as splits between MSA and Non-MSA. Approximately half of GTE's ONA Products are available to 87% of GTE's lines. The MSA areas (i.e., those areas containing 72 % of GTE's lines) seem to provide the higher percentages since GTE's modernization program is deployed sooner in these urbanized areas due to higher customer demand levels.

The percentage of ONA services that are available to greater than 90% of GTE's lines are primarily the non-switched based services, which are available to 100% of the lines. Also, in the 90% or greater category, it appears that there is a much larger influence by the more rural areas (i.e., Non-MSA areas containing 28% of GTE's lines) which do not currently have the network capabilities to support many of the ONA Services.

(4) Q. The information on the 3-year Deployment Report, which was part of the ONA Plan filing, appears to be level in its projections or in certain instances declining, please explain.

A. The report that was filed as part of GTE's ONA Plan was prepared by an external contractor using GTE data. GTE retained the contractor to prepare the 3-year deployment report as well as the upcoming ONA Services User Guide. The 3-year deployment report was completed within 5 days of the required ONA Plan filing date which did not allow sufficient time for a thorough analysis by GTE of the report output. A superficial comparison of GTE's report with those of the RBOCs did not reveal major problems. Since the filing of the ONA Plan, GTE has determined that there is a programming error in the yearly calculations of the report.

Upon analysis of how the program was calculating the percentages in each year of the report, it has been determined that the percentages for the forecasted years are based upon the network capabilities of the base year and is not incorporating GTE's network modernization program (i.e., switch replacements, software upgrades, etc.) in each of the forecasted years. Since the program was not identifying any changes in the switch capabilities for the ONA services, the percentages basically remained the same in each of the subsequent years or possibly decreased since the forecasted lines were increasing.

This programming error has been brought to the attention of the contractor and the coding is currently being revised. GTE will correct the problem, review the revised output of the report for accuracy, and file a revised 3-year deployment report by May 30, 1995.

(5) Q. Please provide clarification on the waiver request to allow ONA tariff filings in the state tariffs to take place 30 days after the Federal Tariffs are effective.

A. The issue is purely one of timing and the impact on the current procedures the GTOCs have in place in most states to mirror the federal access tariffs. It pertains only to the services identified in Column 5 of Attachment A. All of the remaining services listed in Column 4 are already in the tariffs.

Each state has its own rules, statute and procedures that address tariffs and the approval process. These range from automatic mirroring of the federal tariff, to a 10 day interval for approval, to a 60 day interval, and intervals in between. The state filings also often use, as justification, the federal filing and the support that went with it. The current timing is such that in every case, the state access tariff filing is not made until the federal filing goes into effect. In this manner, if some change is required in the federal filing before it becomes effective, the change is known before the state filing. Otherwise, if the state tariff is filed before the federal tariff goes into effect and a change is made, the state filing must also be modified. This would mean a new filing with the state to effect the change and may require the withdrawal and resubmission of the proposed tariff. If the GTOCs are required to file the state tariffs coincident with the federal tariff filing, the GTOCs would be required to file in nearly all of the states a request to delay the normal effective date (from 10 days, 30 days, etc.) to the FCC 90 day interval. This would require each state to alter its current procedure as well.

If the waiver is granted, the current procedures of the GTOCs in each state can continue as normal and this ONA filing can be treated as any other state access filing. The result will be that after the federal tariff is effective, the filings in the states can commence and the state filings will come under the normal state PUC rules and statutes.

With respect to the request by the attorneys for the State of Hawaii's Department of Commerce and Consumer Affairs, please note that there is no access tariff on file in the State of Hawaii currently. Indeed, the proceeding in Docket 7702 is intended to reach a decision regarding intrastate access. GTE would have no objection to providing the state with a copy of the federal ONA tariff as filed.

In addition to the above questions, GTE was asked for additional information which will be provided later. Specifically, by telephonic response to Rose Crellin, answers to the following questions:

1. Can GTE provide CPNI restriction on certain numbers within an account rather than all numbers?
2. Can ESPs order CNSs from the general exchange tariffs on behalf of their clients?
3. Status of new ONA services identified in Section III. A., footnote 6 of GTE's ONA Plan. (Abbreviated dialing and 2W DID with call transfer.)

The following information will be provided by April 30, 1995:

1. Reports listed in Paragraph 33 of GTE's ONA Order which were not included in GTE's ONA Plan filing.
2. Revised CPNI Polling letter for the 2-20 line business customers, plus the sample notification for the greater than 20 line customers.
3. Are the 48 Installation and Maintenance reporting categories, identified in Appendix B of the RBOC 1991 Order, a problem for GTE?
4. Copy of illustrative tariff pages.

The following information will be provided by May 30, 1995:

1. What files/data bases will be restricted via the Password ID requirement (due April 4, 1996)? Identify the files, give a description of the files, their purpose and why GTE will or will not restrict access.
2. Description of how GTE will meet RBOC requirements discussed in 6 FCC Rcd 7646, Paragraph 47.
3. Revised 3-year ONA Services Deployment Report.

It was agreed that a follow-up meeting should be held in about a month to discuss progress on implementation plans, including CPNI.

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GTE ONA PRODUCT LINE

03/09/95

User Guide Ref No.	RBOC ONA Users Guide Service Name	GTE Product Name	GTE Prod Line	Proposed GTE Accs Tariff	PRICING Required
1001	Type A - X.25 Packet Switched	Packet Switching Network Service - X.25	BSA	BSA	
1002	Type B - X.75 Packet Switched	Packet Switching Network Service - X.75	BSA	BSA	
1003	Call Detail Recording Reports - Packet	Call Detail - Packet	CNS		
1004	Call Redirection - Packet	Not Available			
1005	Closed User Groups - Packet	Not Available			
1006	Direct Call - Packet	Not Available			
1007	Fast Select Acceptance - Packet	Fast Select	B/C	BSE	
1008	Fast Select Request - Packet	Fast Select	B/C	BSE	
1009	Hunt Groups - Packet	Not Available			
1010	Menu Access Translator - Gateway	Not Available			
1011	Message Waiting Indicator - Packet Access	Not Available			
1013	Preselection for Data Services	Not Available			
1014	Reverse Charge Acceptance - Packet	Not Available			
1015	Dedicated Metallic	Not Available			
1016	Dedicated Telegraph	Not Available			
1017	Dedicated Voice Grade	Voiceband	BSA	BSA	
1018	Dedicated Program Audio	Program Audio	BSA	BSA	
1019	Dedicated Video	Videoband	BSA	BSA	
1020	Type F - Dedicated Digital (<64kbps)	Digital Data Service (DDS)	BSA	BSA	
1021	Dedicated High Capacity Digital (1.544Mbps)	High Capacity Digital DS1 Service	BSA	BSA	
1022	Dedicated High Capacity Digital (>1.544Mbps)	High Capacity Digital DS3 Service	BSA	BSA	
1023	Dedicated Alert Transport	Alarm Signal Transport Service	BSA		
1024	Dedicated Derived Channel	Not Available			
1025	Dedicated Network Access Link	Data Link	BSA	BSA	NEW
1026	Access To Clear Channel Transmission	Clear Channel Capability	BSE	BSE	
1027	Access To Operations Support Systems Information	Not Available			
1028	Automatic Protection Switching	Automatic Protection Switch	BSE	BSE	
1029	Bridging	Bridging	BSE	BSE	
1030	Conditioning	Conditioning	BSE	BSE	
1031	Data Over Voice (DOV) Service	DOVConnect	BSE	BSE	
1032	Derived Channels (Monitoring)	ScanAlert	CNS		
1033	Extended Superframe Conditioning	Not Available			
1034	Secondary Channel Capability	Digital Data Service Secondary Channel	BSE	BSE	
1035	Statistical Multiplexer	Not Available			
1036	Verify Integrity of Subscriber Lines	Not Available			
1037	Type K - Dedicated Digital (64 kbps)	Digital Data Service	BSA	BSA	
1038	Network Reconfiguration	Not Available			
1039	Type A - Circuit Switched Line	Voice Grade - Line - Circuit Switched	BSA	BSA	NEW NEW NCO
1040	Type B - Circuit Switched Trunk	Voice Grade - Trunk - Circuit Switched	BSA	BSA	
1041	Alternate Routing	Alternate Routing	BSE	BSE	
1042	Answer Supervision With a Line Side Interface	Not Available			
1043	Automatic Callback	Automatic Busy Redial	CNS		
1044	Automatic Recall	Automatic Call Return	CNS		
1045	Call Detail Recording Reports (NOT CentraNet)	Not Available			
1046	Call Forwarding - Busy Line Intrswitch	Call Forwarding Busy Line - Fixed	CNS		
1047	Call Forwarding - Busy Line Interswitch	Call Forwarding Busy Line - Fixed	CNS		
1048	Call Forwarding-Busy/Don't Answer-Cust Ctrl of Activation/Deact.	Call Forward-Busy/No Answer - Variable	CNS		
1049	Call Forwarding-Busy/Don't Answer-Cust Ctrl of Forward-To Num	Call Forward-Busy/No Answer - Variable	CNS		
1050	Call Forwarding - Don't Answer Intrswitch	Call Forward-No Answer - Fixed	CNS		
1051	Call Forwarding - Don't Answer Interswitch	Call Forwarding-No Answer - Fixed	CNS		
1052	Call Forwarding - Multiple Simultaneous Calls Interswitch	Call Forwarding - Multipath	CNS		
1053	Call Forwarding - Variable	Variable Call Forwarding	CNS		

1054	Call Forwarding - Variable - Activation Without Courtesy Call	Variable Call Forwarding	CNS		
1055	Call Forwarding - Variable - Remote Activation/Control	Remote Access - CF Variable	CNS		
1056	Call Waiting - Cancel	Cancel Call Waiting	CNS		
1057	Called Directory Number Delivery via DID	Direct Inward Dialing	BSE		
1058	Flexible ANI Information Digits	Not Available			
1059	Called Directory Number Delivery via 900NXX	Not Available			
1060	Calling Billing Number Delivery - FG B Protocol	Automatic Number Identification	BSE	BSE	NCO
1061	Calling Billing Number Delivery - FG D Protocol	Automatic Number Identification	BSE	BSE	NCO
1062	Coin Phone With Post Dialing Tone Capability	Not Available			
1063	Calling Directory Number Delivery - via BCLID	Not Available			
1064	Calling Directory Number Delivery - via ICLID	Caller ID	B/C		
1065	Carrier Selection On Reverse Charge	800 Service	BSE		
1066	Customer Originated Trace	Call Tracing Service	CNS		
1067	DID Trunk Queuing	Not Available			
1068	Distinctive Ringing	VIP Alert	CNS		
1069	Distinctive Ringing - Terminating Screening	Smart Ring	CNS		
1070	Hot Line	Automatic Ring Down Circuit Signaling	CNS		
1071	Make Busy Key	Not Available			
1072	Message Desk (SMDI)	Forwarded Call Information-Intraoffice	BSE	BSE	NEW
1073	Msg Waiting Indicator(MWI)-Ability To Rec'v Audible Msg Waiting	MW I- Ability To Recieve Audible Message Waiting	CNS		
1074	Msg Waiting Indicator(MWI)-Ability To Rec'v Visual Msg Waiting	Not Available			
1075	Message Waiting Indicator - Activation (Audible)	Message Waiting Indication - Audible	BSE		
1076	Message Waiting Indicator - Activation (Visual)	Not Available			
1077	Multiline Hunt Group	Hunt Group Arrangement	BSE	BSE	NCO
1078	Multiline Hunt Group - C.O. Announcements	Not Available			
1079	Multiline Hunt Group-Individual Access To Each Port In Hunt Grp	Not Available			
1080	Multiline Hunt Group - Overflow	Not Available			
1081	Multiline Hunt Group - Uniform Call Distribution Line Hunting	Uniform Call Distribution Arrangement	BSE	BSE	NCO
1082	Multiline Hunt Group - UCD With Queuing	Queuing	BSE	BSE	NEW
1083	Reverse Billing On Circuit Switched Access	Not Available			
1084	Selective Call Forwarding	Special Call Forwarding	CNS		
1085	Selective Call Rejection	Call Block	CNS		
1086	Shared Speed Calling	Not Available			
1087	Speed Calling	Speed Calling - 8 & 30 Number	CNS		
1088	Tandem Routing	Not Available			
1089	Three Way Call Transfer	User Transfer	BSE	BSE	NEW
1090	Uniform 7 Digit Access Number - Remote Call Forwarding	Foreign Exchange	BSE		
1091	Uniform 7 digit Access Number via Overlay Networking	Not Available			
1092	Warm Line	Not Available			
1093	Call Forwarding Don't Answer After Call Waiting (CFDA After CW)	Not Available			
1094	Faster Signaling On DID	Not Available			
1095	Cut Off On Disconnect	Not Available			
1096	Route Diversity	Diversity Routing	BSE	BSE	
9001		Busy Number Redial	CNS		
9002		Saved Number Redial	CNS		
9003		Last Number Redial	CNS		
9004		Call Waiting	CNS		
9005		Three Way Calling	CNS		
9006		Remote Call Forwarding	CNS		
9007		Call Forwarding - Fixed (All Calls)	CNS		
9008		Call Forwarding Busy No Answer - Fixed	CNS		
9009		Special Call Waiting	CNS		
9010		Special Call Acceptance	CNS		
9011		Anonymous Call Rejection	CNS		
9012		Billed Number Screening (BNS)	B/C		
9013		BLANK			
9014		Multiplexing Arrangements	BSE	BSE	
9015		Signaling Arrangements	BSE		

9016		BLANK		
9017		Call Restriction Service	CNS	
9018		Priority-Packet	BSE	
9019		MWI - Ability to Recieve Audible Ring Burst	CNS	
9020		MegaConnect Service (SMDS)	BSE	
9021		GTE Dial DataLink	CNS	
9022		Message Waiting Indication - Audible Ring Burst	BSE	
9023		Customer Controllable Ringing	CNS	
9024		ControlLink DCS	BSE	

Key:

BSA - Basic Serving Arrangement

BSE - Basic Service Element

CNS - Complimentary Network Service

B/C - Both BSE and CNS

NEW - New Rate Element

NCO - Currently Non-Chargable Option in Feature Group Arrangements

ONA SERVICE DEPLOYMENT PROJECTIONS

% of Offered ONA Services Deployed (*)

	# ONA Svcs Offered	80% of Lines or Greater	85% of Lines or Greater	87% of Lines or Greater	90% of Lines or Greater
GTE	84	71%	58%	49%	21%
Ameritech	67	55%			39%
Bell Atlantic	79	73%			70%
BellSouth	94	60%			57%
NYNEX	115	51%			50%
Pactel	61	66%			46%
SWBT	93	73%			49%
US WEST	107	50%			46%

		MSA (72% of Lines)	NON-MSA (28% of Lines)
GTE	80% or Greater	73%	60%
	85% or Greater	73%	38%
	87% or Greater	51%	21%
	90% or Greater	21%	21%

(*) RBOC Data From CC Docket 88-2, MOO Released 12/19/91, GTE Data From ONA Plan Filed 1/4/95